

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

TYRONE WOOLASTON,

Defendant

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5/7/2021

18 Cr. 212 (AJN)

JOINT STIPULATION TO SUPPLEMENT RECORD ON APPEAL

IT IS HEREBY STIPULATED AND AGREED among the United States of America, by Audrey Strauss, United States Attorney for the Southern District of New York, and Thane Rehn and Alison Moe, Assistant United States Attorneys, of counsel, and defendant Tyrone Woolaston, by and with the consent of his attorney, Christopher LaVigne, Esq., that:

1. The Court entered final judgment in favor of the United States of America on December 18, 2020. (ECF No. 176)

2. Counsel for Defendant Woolaston filed its notice of appeal from the final judgment on December 23, 2020. (ECF No. 179)

3. The Clerk of the Court electronically sent the appeal record to the United States Court of Appeals on December 23, 2020.

4. The record on appeal in this action, transmitted to the United States Court of Appeals for the Second Circuit, did not include the following relevant parts of the proceedings in the above-captioned court:

(a) February 13, 2019 Letter from Geoffrey S. Berman, counsel for the United States, to the Honorable Robert W. Sweet (attached as Exhibit 1).

- (b) February 14, 2019 Letter from Christopher L. Lavigne, counsel for Tyrone Woolaston, to the Honorable Robert W. Sweet in response to Exhibit 1 (attached as Exhibit 2).
- (c) February 13, 2019 Letter from Christopher L. Lavigne, counsel for Tyrone Woolaston, to the Honorable Robert W. Sweet in response to ECF No. 98 (attached as Exhibit 3).
- (d) February 15, 2019 Letter from Christopher L. Lavigne, counsel for Tyrone Woolaston, to the Honorable Robert W. Sweet (attached as Exhibit 4 and Exhibit 4A).
- (e) February 18, 2019 Letter from Geoffrey S. Berman, counsel for the United States, to the Honorable Robert W. Sweet in response to Woolaston's letter dated February 15, 2019 (attached as Exhibit 5).

Wherefore, pursuant to Rule 10(e) of the Federal Rules of Appellate Procedure, the parties hereto, through their respective counsel, stipulate that such matter inadvertently omitted from the record on appeal is designated for inclusion in a supplemental record to be certified and transmitted to the United States Court of Appeals for the Second Circuit.

Dated: New York, New York
April 28, 2021

Audrey Strauss
United States Attorney
Southern District of New York

By: /s/ Thane Rehn on consent
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Counsel for Defendant Tyrone Woolaston

SO ORDERED:



5/7/2021

Hon. Alison J. Nathan
United States District Judge